

**Air Pollution Control
Title V Permit to Operate
Statement of Basis for Permit No. V-SUIT-0022-2014.01
Minor Permit Revision
November 2, 2015**



**BP America Production Company
Florida River Central Delivery Point
Southern Ute Indian Reservation
La Plata County, Colorado**

Description of Permit Revision

On June 18, 2015, the Southern Ute Indian Tribe Air Quality Program (AQP) received a minor permit revision application from BP America Production Company (BP) for the Florida River Central Delivery Point. BP requested permit revisions to (1) remove and add insignificant emission units from the listing of insignificant emission units, (2) remove several permanently decommissioned emission units from the listing of emission units, (3) remove the applicable permit requirements for permanently decommissioned units, and, (4) remove permit condition II.B.3.b., a monitoring requirement of 40 CFR 60 Subpart GG which BP believes to have been erroneously included in the final operating permit.

The permanently decommissioned units include a 35-MMscf/day Tri-ethylene Glycol (TEG) Dehydrator (emission unit Dehy2) and a 135 horsepower emergency diesel generator engine (emission unit Gen1). Emission unit Dehy 2 was subject to the recordkeeping requirements of 40 CFR 63 Subpart HH 63.774(d)(1) for dehydration units at an area source of hazardous air pollutants meeting the exemption criteria specified in 40 CFR 63.764(e); however, the permit did not specifically identify each dehydration unit subject to this recordkeeping requirement, therefore no changes to the permit were necessary. Emission unit Gen1 was subject to the requirements of 40 CFR 63 Subpart ZZZZ for existing emergency compression ignition stationary reciprocating internal combustion engines with a site rating of less than or equal to 500 brake horsepower located at an area source of hazardous air pollutant emissions, and the applicable requirements were included in Section II of the operating permit.

The AQP has revised the insignificant emission unit listings in Table 2 and the emission unit listing in Table 1, as requested. Secondly, the Tribe removed the applicable regulatory requirements of 40 CFR 63 Subpart ZZZZ from the Part 70 operating permit for emission unit Gen1. The request to remove the 40 CFR 60 Subpart GG monitoring requirement of permit condition II.B.3.b. has not been made. This permit condition has been included in the permit under the authority of RAC 2-110(5) to ensure compliance and add enforceability to the monitoring requirements of 40 CFR 60 Subpart GG.

Specifically, the following revisions have been made to this permit:

Section I.B. - Source Emission Points

- Removed generator engine Gen1, IEU2 Dehy#2 re-boiler, and the IEU7 fuel gas scrubber from the insignificant emission unit listing in Table 2

- Removed TEG dehydration unit Dehy2 from the emission unit listing in Table 1
- Added 8 comfort heaters mistakenly omitted from the Part 70 permit application to the insignificant emission unit listing in Table 2

Section II. - Site Specific Requirements

- Removed the 40 CFR 63 Subpart ZZZZ regulatory requirements for emission unit Gen1

Section III – Facility-Wide Requirements

- Removed the Alternative Operating Scenarios for Engines permit conditions

Additionally, the Potential to Emit Table has been revised to reflect the emission reductions resultant from the removal of Dehy2 and Gen1.

Revised Potential to Emit BP America Production Company, Florida River Central Delivery Point

Emission Unit ID	Regulated Air Pollutants in tpy								
	NO _x	VOC	SO ₂	PM ₁₀	CO	Lead	Total HAPs	Largest Single HAP (CH ₂ O)	GHGs (CO ₂ e mtpy)
T-1	92.9	5.7	0.6	1.1	49.1	0.0	0.5	0.5	18,961.6
T-2	97.9	6.0	0.6	1.1	20.7	0.0	0.5	0.5	19,986.6
AH-1	24.4	1.3	0.0	1.9	20.5	0.0	0.0	0.0	22,805.2
AH-2	24.1	1.3	0.0	1.8	20.2	0.0	0.0	0.0	22,549.0
Plant Flare	2.7	0.0	0.0	0.0	14.9	0.0	0.0	0.0	36,847.1
Dehy1	0.0	52.4	0.0	0.0	0.0	0.0	4.3	0.0	10,773.0
Dehy3	0.0	69.9	0.0	0.0	0.0	0.0	0.1	0.0	30,635.8
Total IEUs	5.1	0.7	0.1	0.4	4.3	0.0	0.0	0.0	130,893.7
Total	247.1	137.3	1.3	6.3	129.7	0.0	5.5	1.0	293,452

AQP is making these revisions as a minor permit revision in accordance with RAC 2-111(3). The permit will be reissued as permit number V-SUIT-0022-2014.01.

For specific applicability information regarding the Part 70 permit for this facility, please reference the Statement of Basis for permit number V-SUIT-0022-2014.00.